

In re Patent Application of  
DELLMO ET AL.  
Serial No. 10/806,937  
Filed: MARCH 23, 2004

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#### REMARKS

Applicants thank the Examiner for the careful and thorough examination of the present application. The patentability of the claims is discussed in detail below.

#### I. The Invention

The invention is directed to interfaces used in cryptographic devices. More particularly, independent Claim 37, for example, recites a cryptographic module including a user network interface and a cryptographic processor coupled thereto. The cryptographic processor communicates with the user network interface using a predetermined protocol, and the cryptographic processor may also communicate with a network communications module using the predetermined protocol.

Independent Claim 1 is a device counterpart of independent Claim 37 and further recites a communication module coupled to the cryptographic module. The communications module includes a network interface coupled to the cryptographic processor. Independent Claim 12 is directed to a corresponding cryptographic device where the cryptographic module includes a Local Area Network (LAN), the communications module includes a network LAN interface, the cryptographic processor communicates using a Media Independent Interface (MII), and the cryptographic module and communications module both operate using at least one unique external media access control (MAC) address, and at least one fixed internal MAC address. Independent Claim 21 is a method

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counterpart of independent Claim 1. Independent Claim 28 is a system counterpart of independent Claim 1.

## II. The Claims are Patentable

### A. Independent Claims 1, 21, 28, and 37 are Patentable

The Examiner rejected independent Claims 1, 21, 28, and 37 as being anticipated by Dellmo et al. (U.S. Publication No. 2002/0095594) assigned to the assignee of the current application. Dellmo et al. is directed to a secure wireless LAN device including a housing, a wireless transceiver carried by the housing, and a cryptography circuit carried by the housing. A media access controller (MAC) is included and implements a predetermined wireless LAN MAC protocol. The cryptography circuit includes a cryptography processor, and a control gateway circuit connected to the MAC and the wireless transceiver. The secure wireless LAN device also includes a user network interface carried by the housing and connected to the MAC.

Applicants respectfully submit that Dellmo et al. does not disclose the cryptographic processor for communicating with the user network interface using a predetermined protocol, and also for communicating with a network communications module using the predetermined protocol. Instead, Dellmo et al. discloses a MAC 60 that may implement a predetermined wireless LAN MAC protocol (Paragraph 0040). Dellmo et al. fails to disclose that the communication between the cryptographic processor and the user network interface, and that the communication between the

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network communications interface both use the same predetermined protocol.

Accordingly, independent Claims 1, 21, 28, and 37 are patentable over prior art. In view of the patentability of these independent claims, it is submitted that their dependent claims, which recite yet further distinguishing features are also patentable over the cited references for at least the reasons set forth above. Accordingly, these dependent claims require no further discussion herein.

B. Independent Claim 12 is Patentable

The Examiner rejected independent Claim 12 over a three-way combination of Dellmo et al., Boucher et al. (U.S. Patent No. 6,427,173), and Nguyen (U.S. Application No. 2002/0001307). The Examiner cited Dellmo et al. as teaching a cryptographic device comprising a cryptographic module and a communications module coupled thereto. The cryptographic module includes a user LAN interface and a cryptographic processor. As noted above, Dellmo et al. does not disclose the cryptographic processor for communicating with the user network interface using a predetermined protocol, and also for communicating with a network communications module using the predetermined protocol.

The Examiner correctly recognized that Dellmo et al. does not teach a cryptographic processor communicating with the user network interface using a Media Independent Interface (MII). The Examiner then turned to Boucher et al. for this noted deficiency. The Examiner contended Boucher et al.

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discloses the cryptographic processor communicating with the user network interface using an MII, and the cryptographic processor communicating with the network LAN interface using the MII. Boucher et al. is directed to a device for processing network communication to greatly increase the speed and efficiency of transferred data. Boucher et al. discloses an intelligent network interface card connected with four network lines that transport data along a number of different conduits, where each connection provides an MII.

The Examiner further correctly recognized that even a selective combination of Dellmo et al. and Bouchard et al. fails to teach the cryptographic processor communicating with the network LAN interface using the MII and cryptographic module both operating using at least one unique external media access control (MAC) address, and at least one fixed internal address. The Examiner turned to Nguyen et al. for this deficiency. Nguyen et al. is directed to a method and apparatus for improving the configuration of virtual connections. Virtual path identifier and virtual channel identifier availability indexes are made available to network administrators in order to reduce the potential for misconfiguration.

Applicants respectfully submit that the Examiner's proposed combination of Dellmo et al., Bouchard et al., and Nguyen et al. is improper. Applicants point out that Dellmo et al., whose primary objective is to provide greater security in a wireless LAN environment, teaches a secure wireless LAN device including a housing, a wireless transceiver carried by

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the housing, and a cryptography circuit carried by the housing. Conversely, Bouchard et al. and Nguyen et al. disclose attempts at efficient network communication and virtual connection configuration in a non-secure environment. Applicants submit that the Examiner is using impermissible hindsight reconstruction based on Applicants' specification in an attempt to produce claimed invention by selectively assembling disjoint pieces of the prior art. Indeed, a person having ordinary skill in the art would be taught away from the combining the increased network efficiency and the improved virtual connection configuration of Bouchard et al. and Nguyen et al. with the secure wireless LAN device of Dellmo et al.

Accordingly, Applicants submit that independent Claim 12 is patentable over the prior art. It is submitted that its dependent claims, which recite yet further distinguishing features are also patentable over the cited references for at least the reasons set forth above. Accordingly, these dependent claims require no further discussion herein.

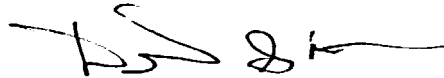
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III. Conclusion

In view of the arguments presented above, it is submitted that all of the claims are patentable. Accordingly, a Notice of Allowance is respectfully requested in due course. If the Examiner determines any remaining informalities exist, he is encouraged to contact the undersigned attorney at the telephone number listed below.

Respectfully submitted,



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